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6 Attorneys for Defendant
EDGAR RAFAEL NAVARRO CHAVOYA
7

8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE EASTERN DISTRICT OF CALIFORNIA
10

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 vs.

14 EDGAR RAFAEL NAVARRO
CHAVOYA,

15 Defendant.
16

Case No. 1:21-cr-00314-JLT-SKO

**STIPULATION TO CONTINUE STATUS
CONFERENCE; ORDER**

Date: January 18, 2023

Time: 1:00 p.m.

Judge: Hon. Sheila K. Oberto

17 IT IS HEREBY STIPULATED by and between the parties through their respective
18 counsel, Assistant United States Attorney Alexandre Dempsey, counsel for plaintiff, and
19 Assistant Federal Defender Erin Snider, counsel for Edgar Rafael Navarro Chavoya, that the
20 Court may continue the status conference currently scheduled for October 19, 2022, at 1:00 p.m.
21 to January 18, 2023, at 1:00 p.m.

22 The parties agree and request the Court find the following:

- 23 1. By previous order, this matter was set for a status conference on October 19,
24 2022.
- 25 2. The government has produced initial discovery, consisting of 575 Bates-marked
26 pages.
- 27 3. Defense counsel requires additional time to review discovery, consult with her
28 client, conduct investigation into the charges (including Mr. Navarro Chavoya's prior

1 deportation), and explore potential resolution with the government.

2 4. Defense counsel believes that failure to grant the above-requested continuance
3 would deny her the reasonable time necessary for effective preparation, taking into account the
4 exercise of due diligence.

5 5. The government does not object to the continuance.

6 6. Based on the above-stated findings, the ends of justice served by continuing the
7 case as requested outweigh the interest of the public and the defendant in a trial within the
8 original date prescribed by the Speedy Trial Act.

9 7. For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
10 *et seq.*, within which trial must commence, the time period of October 19, 2022, to January 18,
11 2023, inclusive, is deemed excludable pursuant to 18 U.S. C. § 3161(h)(7)(A) and (B)(iv).

12 **IT IS SO STIPULATED.**

13
14 Respectfully submitted,

15 PHILLIP A. TALBERT
16 United States Attorney

17 Date: October 11, 2022

/s/ Alexandre Dempsey
18 ALEXANDRE DEMPSEY
19 Assistant United States Attorney
Attorney for Plaintiff

20 HEATHER E. WILLIAMS
21 Federal Defender

22 Date: October 11, 2022

/s/ Erin Snider
23 ERIN SNIDER
24 Assistant Federal Defender
Attorney for Defendant
EDGAR RAFAEL NAVARRO CHAVOYA

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ORDER

IT IS SO ORDERED. The status conference currently scheduled for October 19, 2022, at 1:00 p.m. is hereby continued to January 18, 2023, at 1:00 p.m. For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. 3161, *et seq.*, within which trial must commence, the time period of October 19, 2022, to January 18, 2023, inclusive, is excluded pursuant to 18 U.S.C. §§ 3161(h)(7)(A) and 3161(h)(7)(B)(iv).

Date: 10/12/2022

Sheila K. Oberto

Hon. Sheila K. Oberto
United States Magistrate Judge